

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket Nos. 494, 538, 541 & 543

**CERTIFICATION OF COUNSEL REGARDING ORDER DENYING MOTION OF
RAHUL SINGH FOR RELIEF TO DEFRAUDED SHAREHOLDERS**

The undersigned hereby certifies as follows:

1. On September 29, 2023, Rahul Singh (“**Mr. Singh**”), filed the *Motion of Rahul Singh for Relief to Defrauded Shareholders* [Docket No. 494] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”). Pursuant to the Motion, objections or responses to the Motion were to be filed and served no later than October 11, 2023 (the “**Objection Deadline**”). A hearing to consider the relief requested in the Motion took place before the Bankruptcy Court on October 18, 2023 at 10:30 a.m. (ET) (the “**October 18th Hearing**”).

2. On October 11, 2023, the Debtors filed the *Debtors’ Objection to Motion of Rahul Singh for Relief to Defrauded Shareholders* [Docket No. 538]; together with the *Official Committee of Unsecured Creditors Objection to Motion of Rahul Singh for Relief to Defrauded Shareholders* [Docket No. 541]; and *Joinder of the Official Committee of Equity Security Holders*

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

of Lordstown Motor Corp., et al., to the Debtors' Objection to Motion of Rahul Singh for Relief to Defrauded Shareholders [Docket No. 543].

3. At the October 18th Hearing, the Bankruptcy Court heard and considered statements and arguments of counsel with respect to the Motion. At the conclusion of the October 18th Hearing, the Bankruptcy Court issued a bench ruling denying the Motion for the reasons set forth on the record. At the direction of the Bankruptcy Court, the Debtors have prepared a proposed form of order (the “**Proposed Order**”) denying the Motion. A copy of the Proposed Order is attached hereto as **Exhibit A**.

4. The Proposed Order has been circulated to Mr. Singh who does not object to the entry of the Proposed Order.

5. The Debtors therefore respectfully request that the Bankruptcy Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, at its earliest convenience.

Dated: October 20, 2023
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u> WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p>
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